To: King County Growth Management Planning Council

From: Tom Carpenter

Speaking today for the Upper Bear Creek, Four Creeks, and Greater Maple Valley Unincorporated Area Councils, whose service areas include over 160 square miles of King County's unincorporated area, I can't express strongly enough our disappointment with the GMPC's debate on the policy removing sewer exemptions for urban-serving schools in the Rural Area and the policy specifically authorizing urban-driven facilities that support Master Planned Developments in the Rural Area.

The SCA, the school districts, timber companies, developers, and, unfortunately, County Councilmembers whose districts are overwhelmingly rural, are demonstrating why we're so concerned about urban encroachment into the Rural Area and the plight along the Urban Growth Boundary (UGB) fringe area.

With an 18% decline in rural area school age population over the last 10 years, these schools sites, seven of which are inside or immediately adjacent to our service areas, are intended to serve an urban population. Developing these sites with urban-serving facilities will be permanently devastating to the local rural character, rural-related infrastructure, and rural community plans.

For example, awash with approved levy funds, the Issaquah School District bought 80-acres in May Valley East assessed as A-1 Pastureland. The site, over 3-miles from the nearest Urban Growth Area, is in the middle of a significant equine community. For a variety of reasons, it's just about the worst place to put urban-serving schools and a maintenance facility and will forever have a detrimental effect on local rural community plans.

As far as the MPDs are concerned, so much for self-contained. A major stormwater facility intended for the Rural Area near Black Diamond is not being driven by rural area needs. Calling it a "lake" is a blatant attempt to deceive

The Growth Management Hearings Board and the WA State Supreme Court have made it very clear that urban-serving and urban-driven facilities have no business in the Rural Area. Both have acknowledged that these sites create an epicenter that will inevitably lead to the urge to urbanize.

We're losing the rural area through "creeping normalcy". Approving a school site, overflow of facilities for a Master Planned Development, a Transfer Development Right receiving site, a tightline sewer, a stormwater retention facility, or a number of other examples of land used for urban purposes sited in the rural area seem insignificant when viewed individually. But viewed collectively these urban uses in the UGB fringe areas have created an urban/rural ecotone clearly intended as a covert way to eventually expand the Urban Growth Area. Unfortunately, current county policies do little to prevent this "creeping" encroachment.

Policies PF-12, along with DP-45 through DP-51 as currently written, go a long ways toward actually doing things to protect the rural area. Schools and MPDs have alternatives including eminent domain; communities don't. Please approve the CPPs as written and stop the urbanization of the Rural Area and the covert intent to expand the UGA.